

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARTA BUENO,

Plaintiff,

-against-

EUROSTARS HOTEL COMPANY, S.L., FRONT
PROPERTY HOTEL CORPORATION, and
AMANCIO LOPEZ SEIJAS, jointly and severally,

Defendants.

1:21-cv-00535-MMG-RWL

DECLARATION

Maria L. Chickedantz, Esq. declares, pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury under the laws of the United States of America, that the following is true and correct:

1. I am an attorney for the Plaintiff in the above-captioned action. I respectfully submit this declaration in support of Plaintiff's Opposition to the Defendants' Motion for Summary Judgment.

2. The exhibits listed below are referenced in Plaintiff's Memorandum of Law in Support of her Opposition to the Defendants' Motion for Summary Judgment, as well as the Plaintiff's Response to the Defendants Rule 56.1 Statement of Undisputed Facts.

3. Attached hereto as **Pl. Ex. 11**¹ is a true and correct copy of an email chain between Marta Bueno and Cristina Marroqui dated December 26, 2019 to January 4, 2020, with accompanying certified English translation attached hereto as **Pl. Ex. 11A**.

¹ Counsel for the parties agreed to use sequential numbers for deposition exhibits. Plaintiff's deposition exhibits started at 1 and Defendants' exhibits started at 100. For simplicity, the parties have used the same exhibit numbers for purposes of this briefing. Not all deposition exhibits were

4. Attached hereto as **Pl. Ex. 15** is a true and correct copy of an email chain between Cristina Marroqui and Marta Bueno, with carbon-copy to Marco, dated January 16, 2020, with accompanying certified English translation attached hereto as **Pl. Ex. 15A**.

5. Attached hereto as **Pl. Ex. 17** is a true and correct copy of an email chain between Marta Bueno, Cristina Marroqui, and Marta Sanjurjo dated January 4, 2020 to January 17, 2020, with accompanying certified English translation attached hereto as **Pl. Ex. 17A**.

6. Attached hereto as **Pl. Ex. 18** is a true and correct copy of an email chain between Cristina Marroqui, Marta Sanjurjo and Teresa Jimenez dated January 20, 2020 to January 21, 2020, with accompanying certified English translation attached hereto as **Pl. Ex. 18A**.

7. Attached hereto as **Pl. Ex. 19** is a true and correct copy of an email chain between Cristina Marroqui, Marta Sanjurjo and Teresa Jimenez dated January 22, 2020, with accompanying certified English translation attached hereto as **Pl. Ex. 19A**.

8. Attached hereto as **Pl. Ex. 31** is a true and correct copy of the relevant pages excerpted from a report, by Cristina Marroqui, sent via email to Amancio Lopez Seijas at his work account and to his assistant at “Presidencia Grupo Hotusa”, with carbon-copy to Marina Lopez, dated February 10, 2020, with accompanying certified English translation attached hereto as **Pl. Ex. 31A**.

9. Attached hereto as **Pl. Ex. 40** is a true and correct copy of the relevant pages excerpted from a report, by Patricia Cereijo, sent via email to Amancio Lopez Seijas at his work account and to his assistant at “Presidencia Grupo Hotusa” dated February 23, 2020, with accompanying certified English translation attached hereto as **Pl. Ex. 40A**.

used as part of this briefing, which accounts for gaps in the numbering sequence. Some exhibits relevant to this briefing were already introduced by Defendants. (*See* Gee Decl. at Doc. 139.) In turn, this declaration introduces only certain additional exhibits that are relevant to this briefing.

10. Attached hereto as **Pl. Ex. 48** is a true and correct copy of the Defendants' submission pursuant to the Pilot Project Regarding Initial Discovery Protocols for Employment Cases Alleging Adverse Action, dated August 16, 2022.

11. Attached hereto as **Pl. Ex. 49** is a true and correct copy Defendants' Responses and Objections to the Plaintiff's First Set of Interrogatories, which were served June 21, 2023.

12. Attached hereto as **Pl. Ex. 50** is a true and correct copy of Defendants' First Amended Responses and Objections to the Plaintiff's First Set of Interrogatories, which were served October 6, 2023.

13. Attached hereto as **Pl. Ex. 51** is a true and correct copy of Defendants' Second Amended Responses and Objections to the Plaintiff's First Set of Interrogatories, which were served November 17, 2023.

14. Attached hereto as **Pl. Ex. 59** is a true and correct copy of the transcript of the deposition of Defendant Amancio Lopez Seijas.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: November 23, 2024



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